

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

BRIAN BEGLEY, on behalf of
himself and all others similarly
situated,

Plaintiff,

v.

WINDSOR SURRY COMPANY,
d/b/a WINDSORONE; AND
WINDSOR WILLITS COMPANY,
d/b/a WINDSOR MILL

Defendants.

Civil Case No. 1:17-cv-00317-LM

**SUPPLEMENTAL JOINT STATEMENT RE CASE MANAGEMENT AFTER LIFTING
OF LITIGATION STAY**

NOW COME the parties, by and through counsel, and respectfully submit the within Joint Statement Regarding Status of Settlement Discussions, stating as follows:

1. Following the March 5, 2019 order of the Court, counsel for Plaintiff and Defendant met-and-conferred in good faith regarding the schedule. The parties now submit this joint statement following that discussion and pursuant to the Court's March 5 order, which indicated the litigation stay shall be lifted on April 19, 2019.

2. The Court previously entered a detailed case management order prior to the parties agreeing to a stay. (Dkt. No. 46). The parties suggest that the Court enter another case management order with a schedule that generally tracks the previous schedule, but beginning on or around the date the stay is lifted, in order to give the parties a reasonable opportunity to prepare the case for class certification and trial. Accordingly, Plaintiff suggests the following schedule:

Phase 1: Class Certification

Plaintiff's Proposal

SCHEDULING DESIGNATION	DEADLINE
Answer	April 26, 2019
Mandatory Disclosures	May 10, 2019
Close of Discovery	November 14, 2019
Joinder of Additional Parties and Amendment of Pleadings	Plaintiff July 12, 2019 Defendant August 16, 2019
Third Party Actions	August 16, 2019
Expert Disclosures	Plaintiff September 13, 2019 Defendant October 4, 2019
Rebuttal Reports and Rule 26(e) supplements	November 1, 2019
Motion for Class Certification	January 17, 2020

Defendant's Proposal

SCHEDULING DESIGNATION	DEADLINE
Defendant's Mediation Response	May 23, 2019
Answer/Counterclaim	May 31, 2019
Scheduled Mediation	June 20, 2019
Mandatory Disclosures	July 8, 2019
Close of Discovery	February 28, 2020
Joinder of Additional Parties and Amendment	Plaintiff July 12, 2019

of Pleadings	Defendant August 16, 2019
Third Party Actions	October 24, 2019
Expert Disclosures	Plaintiff November 25, 2019 Defendant December 18, 2019
Rebuttal Reports and Rule 26(e) supplements	January 20, 2020
Motion for Class Certification	March 4, 2020

Phase 2: Liability

Plaintiff's Proposal

SCHEDULING DESIGNATION	DEADLINE
Trial	January 2021
Mandatory Disclosures	30 days after court's ruling on class certification
Disclosure of Claims Against unnamed parties	30 days after court's ruling on class certification
Disclosure of Experts and Reports	Plaintiff June 26, 2020 Defendant July 24, 2020
Rebuttal Reports and Rule 26(e) supplementations	By close of discovery
Motion for Summary Judgment	July 24, 2020
Close of Discovery	60 days before trial
Joint Statement Re: Mediation	July 23, 2020
Challenges to Expert Testimony	45 days before trial

Defendant's Proposal

SCHEDULING DESIGNATION	DEADLINE
Trial	January 2021
Mandatory Disclosures	30 days after court's ruling on class certification
Disclosure of Claims Against unnamed parties	30 days after court's ruling on class certification
Disclosure of Experts and Reports	Plaintiff July 20, 2020 Defendant August 12, 2020
Rebuttal Reports and Rule 26(e) supplementations	By close of discovery
Motion for Summary Judgment	September 16, 2020
Close of Discovery	60 days before trial
Joint Statement Re: Mediation	August 19, 2020
Challenges to Expert Testimony	45 days before trial

Defendants' Position

Respectfully submitted,
 BRIAN BEGLEY
 By his attorneys,

April 19, 2019

/s/ S. Clinton Woods
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April 19, 2019

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and

WINDSOR SURRY COMPANY and
WINDSOR WILLITS COMPANY

By their attorneys,

April 19, 2019

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically served through ECF to all counsel of record on this date.

/s/ S. Clinton Woods

S. Clinton Woods